

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THOMAS DAVID WHOLECHEESE,

Defendant.

No. 4:16-cr-00008-RRB

DECLARATION OF JAMES KLUGMAN

I, James Klugman, declare and state as follows:

1. Upon receiving the motion for compassionate release in this case, the U.S. Attorney's Office requested information about the defendant from the Bureau of Prisons.
2. The Bureau of Prisons provided the defendant's institutional medical records, which are attached to the government's response. They reflect that he was diagnosed with COVID-19 on April 26, 2020.
3. The Bureau of Prisons further confirmed that, as of May 29, 2020, its records contained "no compassionate release request, progress report, or reentry plan" pertaining to the defendant.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED June 2, 2020 at Anchorage, Alaska.

BRYAN SCHRODER
United States Attorney

/s James Klugman
JAMES KLUGMAN
Assistant United States Attorney
United States of America